

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., *et al.*,

Debtors.

Chapter 11

Case No. 24-12480 (JTD)
(Jointly Administered)

**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS,
AND REQUEST TO BE ADDED TO MASTER SERVICE LIST**

PLEASE TAKE NOTICE that the undersigned appear in the above-captioned case on behalf of BCDC Portfolio Owner LLC, BCHQ Owner LLC, Brookfield Properties Retail, Inc., Curblin Properties Corp., First Washington Realty, GCP Boom LLC, JLL Property Management (Franklin Mall), Kite Realty Group, L.P., NNN REIT, Inc., Regency Centers, L.P., Shamrock A. Owner LLC, and SITE Centers Corp. ("Landlords"). Pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and section 1109(b) of the Bankruptcy Code, the Landlord requests that all notices given or required to be given and all papers served in these cases be delivered to and served upon the parties identified below at the following address and be added to the Master Service List:

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints, or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile, or otherwise in these cases.

This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is neither intended nor shall be deemed to waive the Landlords' (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy, or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which the Landlords is or may be entitled under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: November 25, 2024

LAW OFFICE OF SUSAN E. KAUFMAN, LLC

/s/ Susan E. Kaufman

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